

STEPHEN P. SCARING, P.C.

ATTORNEYS AT LAW

SUITE 501

666 OLD COUNTRY ROAD

GARDEN CITY, N. Y. 11530-2004

STEPHEN P. SCARING, ESQ.

OF COUNSEL

MATTHEW W. BRISSENDEN

SUSAN SCARING CARMAN

(516) 683-8500

FAX

(516) 683-8410

sscaring@scaringlaw.com

July 15, 2025

**VIA ECF**

Honorable Allyne R. Ross  
United States District Court Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

***Re: United States v. Kim, et.al.***  
***Docket No. 23-cr-191***

Dear Judge Ross:

I represent Dacheng Lu, a defendant in the above captioned case. The defendant is requesting a temporary modification of his travel restrictions to allow him to take a short family vacation. He wishes to travel to Niagara Falls on July 17<sup>th</sup> and depart on the 19<sup>th</sup>. He would then request permission to travel from his home to Washington D.C. on July 21<sup>st</sup> and return on July 23<sup>rd</sup>. Assistant United States Attorney Patrick J. Campbell has no objection.

I am sorry for the late request. Thank you.

Respectfully submitted,

/s/ Stephen P. Scaring  
STEPHEN P. SCARING  
Attorney for the defendant

cc: Patrick Campbell, Assistant United States Attorney